

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**In re Terrorist Attacks on September 11, 2001**

**As relates to 03 MDL 1570 (GDB)(SN)**

CIVIL ACTION NO. 1:17-cv-3908

ARROWOOD INDEMNITY COMPANY,  
f/k/a ROYAL INDEMNITY COMPANY, and  
ARROWOOD SURPLUS LINES INSURANCE  
COMPANY, f/k/a ROYAL SURPLUS LINES  
INSURANCE COMPANY,

Plaintiffs

v.

KINGDOM OF SAUDI ARABIA, SAUDI  
HIGH COMMISSION FOR RELIEF OF BOSNIA  
& HERZEGOVINA, AL RAJHI BANK,  
NATIONAL COMMERCIAL BANK,  
and SAUDI BINLADIN GROUP,

Defendants.

**MOTION TO SUBSTITUTE COUNSEL**

**COME NOW**, Arrowood Indemnity Company, f/k/a Royal Indemnity Company, and Arrowood Surplus Lines Insurance Company, f/k/a Royal Surplus Lines Insurance Company, Plaintiffs (the “Arrowood Plaintiffs”) in *Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al.*, Civil Action No. 1:17-cv-3908, and file this Motion to Substitute Counsel. As grounds for said Motion, the Arrowood Plaintiffs state as follows:

1. The Arrowood Plaintiffs request the Court to grant permission for James L. Bernard and Patrick N. Petrocelli, formerly of Stroock & Stroock & Lavan LLP to withdraw and to substitute Dennis G. Pantazis and Timothy B. Fleming as attorneys of record as to the Arrowood Plaintiffs only.

2. The Arrowood Plaintiffs have retained Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC and Timothy B. Fleming of Wiggins Childs Pantazis Fisher Goldfarb PLLC to represent them in this matter.

3. The Arrowood Plaintiffs, James L. Bernard, Robert Lewin, Michele L. Jacobson, Beth K. Clark, and Patrick N. Petrocelli, and Dennis G. Pantazis and Timothy B. Fleming consent to the substitution of counsel as requested herein (signed Consent attached hereto as **Exhibit A**).

**WHEREFORE, PREMISES CONSIDERED**, Arrowood Indemnity Company, f/k/a Royal Indemnity Company, and Arrowood Surplus Lines Insurance Company, f/k/a Royal Surplus Lines Insurance Company, pray that this Honorable Court enter an Order allowing James L. Bernard and Patrick N. Petrocelli, formerly of Stroock & Stroock & Lavan LLP, to withdraw from representing the Arrowood Plaintiffs and to substitute Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC and Timothy B. Fleming of Wiggins Childs Pantazis Fisher Goldfarb PLLC as attorneys of record for the Arrowood Plaintiffs **only** in *Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al.*, Civil Action No. 1:17-cv-3908.

RESPECTFULLY SUBMITTED,

*/s/ Dennis G. Pantazis*  
Dennis G. Pantazis  
*Attorney for Arrowood Plaintiffs*

**OF COUNSEL:**

WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB LLC  
The Kress Building  
301 Nineteenth Street North  
Birmingham, Alabama 35203  
Telephone: (205) 314-0531  
Facsimile: (205) 314-0731  
Email: dgp@wigginschild.com

*/s/ Timothy B. Fleming*  
Timothy B. Fleming  
*Attorney for Arrowood Plaintiffs*

**OF COUNSEL:**

WIGGINS CHILDS PANTAZIS  
FISHER GOLDFARB PLLC  
2208 18th Street, NW, #110  
Washington, DC 20009  
Telephone: (202) 467-4489  
Facsimile: (205) 453-4907  
Email: [tfleming@wigginschildsp.com](mailto:tfleming@wigginschildsp.com)